

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

INVESTIGATION OF KENTUCKY UTILITIES)	
COMPANY'S AND LOUISVILLE GAS &)	
ELECTRIC COMPANY'S RESPECTIVE NEED)	CASE NO.
FOR AND COST OF MULTIPHASE LANDFILLS)	2015-00194
AT THE TRIMBLE COUNTY AND GHENT)	
GENERATING STATIONS)	

COMMISSION STAFF'S INITIAL REQUEST FOR INFORMATION
TO STERLING VENTURES, LLC

Sterling Ventures, LLC, ("Sterling Ventures"), pursuant to 807 KAR 5:001, is to file with the Commission the original in paper medium and an electronic copy of the following information. The information requested herein is due on or before July 16, 2015. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Sterling Ventures shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which

Sterling Ventures fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When filing a document containing personal information, Sterling Ventures shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the document so that personal information cannot be read.

1. Refer to the Sterling Ventures Formal Complaint (“Complaint”), page 9, paragraph 25. Provide a copy of the referenced December 12, 2011 electronic mail sent by Scott Straight of Kentucky Utilities Company.

2. Refer to the Complaint, page 17, which states: “In addition, according to KDWM, it would require only a permit modification to the Sterling Ventures Special Waste Facility permit in order to allow for storage of CCR generated at the Trimble County Generating Station.”

- a. State if Sterling Ventures has obtained this permit modification. If Sterling Ventures has not obtained the permit modification, explain why it has not done so, and state when Sterling Ventures anticipates being able to obtain the modification.

- b. State whether this statement is accurate in light of the final rule on Disposal of Coal Combustion Residuals (“CCR”) from Electric Utilities, 80 Fed. Reg. (Apr. 17, 2015) (amending 40 CFR Parts 257 and 261) (“CCR Rule”).

c. Explain if there is a date when the existing special wastes permit becomes null and void.

3. State whether and how the CCR Rule impacts Sterling Ventures' proposal to dispose of CCR in its mine.

4. State whether Sterling Ventures has conducted any evaluation or analysis regarding the impact of the CCR Rule on its proposal to dispose of CCR in its mine. If yes, provide a copy of the evaluation or analysis.

5. Describe Sterling Ventures' experience with CCR disposal in general and, in specific, its experience with disposing of CCR in its limestone mine.

6. State whether Sterling Ventures is aware of any other entity that is disposing CCR in a limestone mine located below the water table, and, if so, provide details concerning the location and scope of the CCR disposal.

7. Provide the location(s) of the limestone mine pictured in the documents labeled Exhibit 6C as provided at the June 19, 2015 Informal Conference.¹

8. Explain whether Sterling Ventures has ever considered or proposed the use of the limestone mines for another type of commercial use.

9. Refer to the Executive Summary, at page 2 of the handout entitled "Evaluation of Trimble County Coal Combustion Residual Storage Options–2015" from the June 19, 2015 Informal Conference.² Louisville Gas and Electric Company and Kentucky Utilities Company state that based on their understanding of the CCR Rule, the Sterling Ventures mine site would not likely be permitted to store CCRs. State whether Sterling

¹ See Memorandum regarding the Informal Conference, dated June 24, 2015, and the supplemental Memorandum, dated June 25, 2015.

² Memorandum regarding the Informal Conference, dated June 24, 2015.

Ventures agrees with this statement and, if not, explain the reasons for the disagreement.



Jeff Berouen
Executive Director
Public Service Commission
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DATED **JUL 02 2015**

cc: Parties of Record

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